

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA

C.D.A., minor child, and Mr. A., his father;
and E.A.Q.A., minor child, and Mr. Q., his
father,

Plaintiffs,

v.

United States of America,

Defendant.

Civil Action No. 5:21-cv-00469

STIPULATION AND PROPOSED ORDER FOR EXTENSION OF TIME

Plaintiffs filed this action under the Federal Tort Claims Act, 28 U.S.C. §§ 1346(b)(1), 2671, *et seq.*, and Alien Tort Statute, 28 U.S.C. § 1330, on February 1, 2021.

Defendant United States filed a Motion to Dismiss on April 26, 2021.

Plaintiffs' time to respond to the motion is currently May 10, 2021.

Plaintiffs request a 60-day extension for filing of their response, up to and including July 9, 2021. Defendant consents to this request.

Dated: May 6, 2021

Respectfully submitted,

/s/ Veronica Finkelstein
VERONICA J. FINKELSTEIN
Assistant United States Attorney

/s/ Karen L. Hoffmann
Karen L. Hoffmann
SYRENA LAW
128 Chestnut Street, Suite 301A

*Counsel for the United States of
America*

Philadelphia, PA 19106

Counsel for Plaintiffs

SO ORDERED:

Dated: _____

HON. EDWARD G. SMITH
Judge, United States District Court

CERTIFICATE OF SERVICE

I, Karen Hoffmann, certify that on May 6, 2021, I served a copy of the
Stipulation and Proposed Order for Extension of Time on all parties by CM/ECF.

Date: May 6, 2021

/s/ Karen L. Hoffmann

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